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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

FRESH MIX, LLC,

Plaintiff

vs.

PISANELLI BICE, PLLC, a Nevada Law Firm
and Professional Limited Liability Company,
JAMES P. PISANELLI, ESQUIRE, an
individual, DEBRA L. SPINELLI, ESQUIRE,
an individual, AVA SCHAEFER, ESQUIRE,
an individual, COHEN DOWD QUIGLEY PC,
an Arizona Law Firm and Professional
Corporation, RONALD J. COHEN, an
individual, BETSY LAMM, an individual,
DANIEL QUIGLEY, an individual, JENNA
BROWNLIE, an individual, BRUCE A.
LESLIE, CHTD, A Nevada Firm, BRUCE A.
LESLIE, an individual; BROWNSTEIN
HYATT FARBER SCHRECK LLP; a
Colorado Limited Liability Partnership;
SAMUEL A. SCHWARTZ, an individual, and
SCHWARTZ LAW, PLLC, and ZACHARIAH
LARSON, an individual, and LARSON &
ZIRZOW, LLC

Defendant(s).

Case No. 2:24-cv-00397-JCM-NJK

**STIPULATION TO EXTEND TIME TO
RESPOND TO PLAINTIFF'S FIRST
AMENDED COMPLAINT**

(FIRST REQUEST)

Defendant Larson & Zirzow, LLC and Plaintiff Fresh Mix, LLC, by and through their undersigned attorneys of record, hereby agree and request that the Court extend the deadline for Defendant Larson & Zirzow, LLC to respond to Plaintiff's First Amended Complaint from April 10, 2024 to April 30, 2024.

1 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for the
2 requested extension based upon the following:

3 Plaintiff Fresh Mix, LLC named both Larson & Zirzow and Zachariah Larson as defendants
4 in the captioned matter. Larson & Zirzow was served on March 20, 2024, yielding a response date
5 of April 10, 2024. Mr. Larson has not yet been served. Mr. Larson has arranged to be served on
6 April 9, 2024, which will be deemed the effective date of service. Mr. Larson and the firm would
7 like to file their response on the same date, thus would like to select Mr. Larson's response date
8 (April 30, 2024) as the date both responses will be due.

9 Further, the bankruptcy proceeding that underlies Plaintiff's claims against Mr. Larson and
10 Larson & Zirzow is voluminous, with over 500 docket entries. Counsel for Mr. Larson and the firm
11 was not involved in either the bankruptcy described in the complaint, or any of the other proceedings
12 mentioned (a state court arbitration), thus needs some additional time to review these filings in order
13 to evaluate an appropriate response. The extra time requested by this stipulation only applies to
14 Larson & Zirzow.

15 The parties agree that the requested extension furthers the interest of this litigation and is not
16 being requested in bad faith or to delay these proceedings unnecessarily, and request that the Court
17 approve the stipulation.

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1 This is the parties' first request for extension of this deadline.

2 SO STIPULATED:

3 DATED this 8th day of April, 2024.

WILSON, ELSER, MOSKOWITZ, EDELMAN
& DICKER LLP

4 By: /s/ Sheri M. Thome
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Larson & Zirzow, LLC

10 DATED this 8th day of April, 2024.

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Counsel for Plaintiff, Fresh Mix LLC

20 **ORDER**

21 **IT IS SO ORDERED.**

22 
23 United States Magistrate Judge

24 DATED: April 9, 2024
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